

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS  
BID PROTEST**

AMAZON WEB SERVICES, INC.,

Plaintiff,

v.

UNITED STATES OF AMERICA,  
by and through the U.S. Department of Defense,

Defendant,

and

MICROSOFT CORPORATION,

Defendant-Intervenor.

Case No. 19-cv-01796

Judge Campbell-Smith

**FINAL REDACTED VERSION**

**PLAINTIFF AMAZON WEB SERVICES, INC.'S  
[REDACTED] RENEWED MOTION TO SUPPLEMENT THE ADMINISTRATIVE RECORD**

Pursuant to Rule 7 and Appendix C of the Rules of the Court of Federal Claims, Plaintiff Amazon Web Services, Inc. ("AWS") respectfully requests that the Court authorize supplementation of the administrative record and grant discovery in the above-captioned bid protest.

As set forth more fully in the accompanying Memorandum of Points and Authorities in Support, the Department of Defense ("DoD")'s award of the Joint Enterprise Defense Infrastructure ("JEDI") Contract suffers from myriad, highly unusual anomalies and outright errors that prejudiced AWS on nearly every evaluation factor. While these errors reveal a process that was fatally flawed and highly unusual, the clear and lengthy public record of President Donald J. Trump's interference in the JEDI procurement, and how President Trump's actions, comments, and directives were communicated to, understood by, and ultimately affected DoD decision-

[REDACTED]

makers, raise grave concerns that these errors and the ultimate award decision were based on bias and bad faith. Without supplementation and discovery as requested in the accompanying Memorandum of Points and Authorities in Support, the Government's administrative record will be incomplete and cannot be relied upon by the Court to evaluate AWS's allegations about bias and bad faith in the JEDI source selection process. Accordingly, AWS respectfully requests the Court GRANT this Motion.

Dated: January 17, 2020

Respectfully submitted,

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